

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.

Plaintiff

v.

WORLD AVENUE USA, LLC
successor by merger to NIUTECH, LLC.,
DBA "THE USEFUL," ET AL.

Defendants

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Case No. PJM 08 cv 0921

**PLAINTIFF'S MOTION TO EXPAND LENGTH OF
REPLY MEMORANDUM AT DE 483-24**

Plaintiff, through counsel, moves for an order granting an expansion of the 25-page limit under L.R. 105 for reply memoranda for the filing at DE 483-24 and states as follows:

Defendant's objections and responses alone ran 43 pages. DE 483-4. In order to address the objections and arguments in the responses and in the Defendant's opposition memorandum, and to incorporate critical new information from a deposition taken September 29, 2010 related to the availability and relevance of documents and information sought in the discovery requests at issue, it was necessary to include material that expanded the memorandum beyond the 25-page limit. In view of the amount of material at issue as addressed in the motion, opposition and exhibits, expansion of the page limit for the reply memorandum should not be regarded as unreasonable.

Plaintiff's counsel has requested the consent of defendant's counsel for expansion of the page limit as sought in this motion in a meet and confer by telephone on October 25, 2010 (Mr. Ring for Plaintiff, Mr. Saunders for Defendant), and via email on November 5, 2010. As of this

writing, Plaintiff's counsel is not aware of any response from defense counsel on this particular point of page expansion for the reply memorandum.

/s/

November 5, 2010

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